

Monte J. White & Associates, P.C.
Monte J. White
1106 Brook Ave, Hamilton Place
Wichita Falls, TX 76301
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IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
WICHITA FALLS DIVISION

IN RE:

Thomas Lee Barrells

Debtor

§
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§
§
§
§

Case No.09-70073-HdH-13

MOTION TO SELL SECURED PROPERTY FREE AND CLEAR OF LIENS

Comes now Debtor, Thomas Lee Barrells, and respectfully shows the Court the following:

1. Debtor filed a voluntary petition for relief under Chapter 13 of Title 11 of the United States Code on February 26, 2009.
2. Debtor received a loan from Wells Fargo Home Mortgage for the purchase of 808 Mohawk, Burkburnett, Wichita County, TX further described as Lot 5, Block 7, Janlee Heights 6.
3. Debtor has scheduled Wells Fargo Home Mortgage as a secured creditor on Schedule D of the petition and has treated Wells Fargo Home Mortgage as a secured creditor in the Chapter 13 Plan;
4. Debtor wishes to sell the house and apply the proceeds of such sale to the principle debt owing Wells Fargo Home Mortgage in the approximate amount of \$127,000.00 , and;
5. Debtor has located a buyer and an agreement has been reached to sell the house for \$139,000.00. Said agreement is attached as EXHIBIT A.
6. Debtor requests that the Court grant permission to pay such expenses of sale as set forth in the said attached agreement (EXHIBIT A).
7. Debtor requests permission to pay, at the time of closing, the amount of \$400.00 for the preparation and filing of this motion.

FOR THESE REASONS, Debtor requests an order allowing the sale of real property located at 808 Mohawk, Burkburnett, Wichita County, TX, that Wells Fargo Home Mortgage 's lien attach to the proceeds of the sale pending distribution, that costs of sale be paid as per the contract at closing, that taxes be prorated to and paid at the time of closing, that the Trustee be provided a copy of the closing statement that attorney fees in the amount of \$400.00 are approved and for such additional or alternative relief as may be just and proper.

Respectfully submitted,

/s/Monte J. White

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on December 10, 2009, a true and correct copy of the foregoing was served on all parties on the mailing matrix by ECF and/or regular mail:

/s/Monte J. White

Label Matrix for local noticing
0539-7

Case 09-70073-hdh13

Northern District of Texas

Wichita Falls

Wed Dec 9 11:35:43 CST 2009

Chase Bank USA NA

PO BOX 15145

Wilmington DE 19850-5145

Elan Financial Service-TCCU

777 E Wisconsin Ave

Milwaukee, WI 53202-5300

HSBC Best Buy

Attn: Bankruptcy

PO Box 6985

Bridge Water, NJ 08807-0985

Monte J. White & Associates

1106 Brook Ave

Wichita Falls TX 76301-5009

Teresa Barrells

5429 Carlson

Wichita Falls, TX 76302-5140

Washington Mutual - Providian

Attn: Bankruptcy Dept.

PO Box 10467

Greenville, SC 29603-0467

Wells Fargo Hm Mortgag

Attention: Bankruptcy Department MAC-X

3476 Stateview Blvd

Fort Mill, SC 29715-7203

Thomas Lee Barrells

PO Box 735

Holliday, TX 76366-0735

1100 Commerce Street
Room 1254

Dallas, TX 75242-1305

City of Burk-isd-Wichita County

CO Harold Lerew

PO Box 8188

Wichita Falls, TX 76307-8188

(p)US BANK

PO BOX 5229

CINCINNATI OH 45201-5229

Hardeman County Memorial Hospital

P.O.Box 90

Quanah,Tx 79252-0090

PRA Receivables Management LLC

PO Box 41067

Norfolk, VA 23541-1067

Texoma Community Cr Un

Po Box 1320

Wichita Falls, TX 76307-1320

Wells Fargo Bank N.A.

P.O. Box 829009

Dallas, Texas 75382-9009

eCast Settlement Corporation

CO Bass & Associates, P.C.

3936 E. Ft. Lowell Rd., Suite No. 200

Tucson, AZ 85712-1097

UST U.S. Trustee

1100 Commerce Street

Room 976

Dallas, TX 75242-1011

BURKBURNETT INDEPENDENT SCHOOL DISTRICT
CO PERDUE BRANDON FIELDER COLLINS & MOT
PO BOX 8188
WICHITA FALLS TX 76307-8188

ECAST Settlement Corporation

Bass & Associates, P.C.

3936 E. Ft. Lowell Rd., Suite No. 200

Tucson, AZ 85712-1097

HSBC Bank Nevada, N.A.

eCAST Settlement Corporation

CO Bass & Associates, P.C.

3936 E. Ft. Lowell Rd, Suite 200

Tucson, AZ 85712-1083

IRS Special Procedures

1100 Commerce St., Room 951

Mail Stop 5029 DAL

Dallas, TX 75242-1001

Portfolio Recovery Associates, LLC.

PO Box 41067

Norfolk VA 23541-1067

WICHITA COUNTY & CITY OF BURKBURNETT
CO PERDUE BRANDON FIELDER COLLINS & MOT
PO BOX 8188
WICHITA FALLS TX 76307-8188

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(u)Wells Fargo Bank, N.A.	End of Label Matrix	
	Mailable recipients	26
	Bypassed recipients	1
	Total	27